

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
VALDOSTA DIVISION**

KENNETH JOHNSON and JACQUELYN )  
JOHNSON, as Co-Administrators for and )  
on Behalf of the Estate of deceased )  
KENDRICK LAMAR JOHNSON, a minor )

Plaintiffs, )

v. )

Civ Act. No.: 7:20-cv-00004-HL

BRIAN BELL; BRANDON BELL; )  
RICHARD BELL; LOWNDES COUNTY )  
SCHOOL DISTRICT; CHRIS PINE; )  
WESLEY TAYLOR; STRYDE JONES; )  
STEPHEN WESLEY OWENS; )  
LOWNDES COUNTY GEORGIA; )  
RODNEY BRYAN; and DR. )  
MARYANNE GAFFNEY-KRAFT, )

Defendants. )

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**DEFENDANTS BRIAN BELL, BRANDEN BELL, AND RICHARD BELL’S MOTION  
TO DISMISS BY WAY OF SPECIAL APPEARANCE**

COME NOW Defendants Brian Bell, Branden Bell (incorrectly identified as “Brandon Bell”), and Richard Bell (collectively “these Defendants”), by way of special appearance, without waiving and specifically reserving all defenses available to them, pursuant to Federal Rule of Civil Procedure 12(b) and 4(m) and Local Rule 7.1, and file their motion to dismiss, requesting that the Court dismiss all Plaintiffs’ claims against them.

In support of this motion, these Defendants rely on the arguments and citations to authority set forth in their Brief in Support of Defendants Brian Bell, Branden Bell, and Richard Bell’s Motion to Dismiss by Way of Special Appearance, which these Defendants filed contemporaneously with this motion. As shown in the supporting brief, these Defendants’ motion to dismiss should be granted.

Respectfully submitted this 29<sup>th</sup> day of June, 2020

OLIVER MANER LLP

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/s/ Paul H. Threlkeld  
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**CERTIFICATE OF SERVICE**

This is to certify that I have this day served all parties in this case in accordance with the directives from the Court Notice of Electronic Filing (“NEF”), which was generated as a result of electronic filing, by email/electronic notification to the following:

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This 29<sup>th</sup> day of June, 2020

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